Case 5:14-cv-04574-BLF Document 26 Filed 02/06/15 Page 1 of 3

1	Andrew C. Schwartz (State Bar No. 64578) Nick Casper (State Bar No. 244637)			
2	CASPER, MEADOWS, SCHWARTZ & COOK A Professional Corporation			
3	2121 North California Blvd., Suite 1020 Walnut Creek, California 94596			
4	Telephone: (925) 947-1147 Facsimile: (925) 947-1131			
5	schwartz@cmslaw.com ncasper@cmslaw.com			
6	Karen L. Snell (State Bar No. 100266)			
7	Attorney at Law 102 Buena Vista Terrace			
8	San Francisco, CA 94117 Telephone: (415) 225-7592			
9 10	Facsimile: (415) 487-0748 ksnell@snell-law.com			
11	Attorneys for Plaintiffs			
12	UNITED STATES D	DISTRICT COURT		
13	NORTHERN DISTRICT OF CALIFORNIA			
14	SAN JOSE DIVISION			
15				
16	ESTATE OF ANDREA NAHARRO, STACY BARNARD and STEVEN BARNARD,	CASE NO.: 5:14-cv-04570-BLF (PSG)		
17	Plaintiffs,	SECOND STIPULATION TO EXTEND TIME AND PROPOSED ORDER		
18	vs.			
19	COUNTY OF SANTA CLARA, SANTA CLARA			
20	COUNTY SHERIFF'S DEPUTY JENNIFER GALAN and DOES 1-20,			
21	Defendants.	O No. 5:44: 04574 PLE (D00)		
22	CAMIE GIONET, individually and as successor in interest to Andrea Naharro-Gionet,	Case No. 5:14-cv-04574-BLF (PSG)		
23	deceased,			
24	Plaintiff,			
25	vs.			
26	COUNTY OF SANTA CLARA; JENNIFER GALAN; and Does 1-10, inclusive,			
27	Defendants.			
28				

CASPER, MEADOWS, SCHWARTZ & COOK 2121 N. California Blvd., Suite 1020 Walnut Creek, CA 94596 TEL: (925) 947-1147 FAX (925) 947-1131

Case 5:14-cv-04574-BLF Document 26 Filed 02/06/15 Page 2 of 3

1	Pursuant to Civil Local Rules for the United States District Court for the		
2	Northern District of California, Rule 6-2, the parties hereby stipulate to extend time for		
3	the filing of plaintiffs' opposition to Defendants' Motion to Compel Joinder, Motion to		
4	Dismiss, and Motion to Strike and any reply in support of the Motions. The Motions		
5	Distriles, and wotion to other and any reply in support of the Motions. The Motions		
6	were filed on December 23, 2014, and the opposition is currently due February 10,		
7	2015. By this stipulation, the parties seek to extend the deadline for filing the		
8	opposition to March 3, 2015, and the deadline for filing the reply to March 17, 2015.		
9	The reason for this second request to extend the briefing schedule is that the		
10	parties recently learned that Camie Gionet has died. The requested extension of time		
11			
12	will allow the parties to discuss the impact of plaintiff Gionet's death on the issues		
13	raised in defendants' Motions. This extension of time will not result in a change in the		
14	hearing date, which will remain April 23, 2015.		
15			
16	Dated: February 6, 2015	CASPER, MEADOWS, SCHWARTZ & COOK,	
17		/s/- "Andrew C. Schwartz"	
		By: ANDREW C. SCHWARTZ	
18		Attorneys for Plaintiffs Estate of Andrea Naharro, Stacy Barnard and Steven Barnard	
19		•	
20	Dated: February 6, 2015	LAW OFFICE OF KAREN SNELL	
		/s/ - "Karen Snell"	
21		By: KAREN L. SNELL	
22		Attorneys for Plaintiffs Estate of Andrea Naharro, Stacy Barnard and Steven Barnard	
23		,	
24	Dated: February 6, 2015	LAW OFFICES OF MARLES & LEANOS	
25			
26		<u>/s/- "Jamie Leanos"</u> By: JAIME LEANOS	
27	//	Attorneys for Plaintiff Camie Gionet	
28	//		
	İ		

CASPER, MEADOWS, SCHWARTZ & COOK 2121 N. California Blvd., Suite 1020 Walnut Creek, CA 94596 TEL: (925) 947-1147 FAX (925) 947-1131

Case 5:14-cv-04574-BLF Document 26 Filed 02/06/15 Page 3 of 3

1	Dated: February 6, 2015	OFFICE OF THE SANTA CLARA COUNTY
2		COUNSEL
3		/s/ - "Aryn Harris" By: ARYN HARRIS
4		Deputy County Counsel Attorneys for Defendants
5		
6		
7	Pursuant to the parties' stipulation,	it is so ORDERED.
8	Dated:Ø^à¦ˇæ\$^ Â ÎÊ G€ FÍ	Boh Jalim heenan
9		HÓN. BETH LABSON FREEMAN District Judge, United States District Court
10		Northern District of California
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27 28		
ンN	1	

CASPER, MEADOWS, SCHWARTZ & COOK 2121 N. California Blvd., Suite 1020 Walnut Creek, CA 94596 TEL: (925) 947-1147 FAX (925) 947-1131